

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO**

SRINIVASA RAO GUBBALA,

Plaintiff,

v.

ABERCROMBIE & FITCH TRADING CO.,

Defendant.

Case No. 2:24-CV-00444-SDM-CMV

Chief Judge Sarah D. Morrison

Magistrate Chelsey M. Vascura

ABERCROMBIE & FITCH TRADING CO., and
ABERCROMBIE & FITCH CO.,

Counterclaim Plaintiffs,

v.

SRINIVASA RAO GUBBALA
GANNETFISHER LLC

Counterclaim Defendants.

**JOINT MOTION TO EXTEND FACT
DISCOVERY PERIOD FOR LIMITED PURPOSE**

Pursuant to S.D. Ohio Civ. R. 7.3(a), Plaintiff/Counterclaim Defendant Srinivasa Rao Gubbala (“Mr. Gubbala”), Counterclaim Defendant Gannetfisher LLC (“Gannetfisher LLC”), Defendant/Counterclaim Plaintiff Abercrombie & Fitch Trading Co. (“A&F Trading Co.”) and Counterclaim Plaintiff Abercrombie & Fitch Co. (“A&F Co.”) (Mr. Gubbala, Gannetfisher LLC, A&F Trading Co., and A&F Co. are, collectively, the “Parties”) respectfully move the Court for a brief 14-day extension of the current close of fact discovery deadline from October 14, 2024 to **October 29, 2024** for the sole and limited purpose of allowing the Parties to conduct (1) the

deposition of Mr. Gubbala and (2) the Fed. R. Civ. P. Rule 30(b)(6) deposition of Gannetfisher LLC.

On September 6, 2024, A&F properly Noticed the deposition of Mr. Gubbala for October 10, 2024, and the Rule 30(b)(6) deposition of Gannetfisher LLC for October 11, 2024, which are dates prior to the current October 15, 2024 close of fact discovery.

On October 7, 2024, counsel for Mr. Gubbala and Gannetfisher LLC confirmed that although they are not available on the originally Noticed dates, Mr. Gubbala is available on October 24, 2024, and Gannetfisher LLC is available on October 25, 2024, which are dates after the current October 15, 2024 close of fact discovery.

Therefore, the Parties respectfully and jointly move for a brief 14-day extension of the current fact discovery period to **October 29, 2024** for the limited purpose of conducting the depositions of Mr. Gubbala and Gannetfisher LLC.

This is the Parties' first request for an extension of the discovery period in this case.

The Parties do not request extension of any other deadlines in this case and do not anticipate that the requested 14-day extension will affect any future deadlines.

Pursuant to S.D. Ohio Civ. R. 7.3(a) and 7.4, a proposed order granting this Motion is attached hereto.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that, on October 7, 2024, I caused a true and correct copy of the above document to be served by electronic means on the following counsel of record for Plaintiff and Counterclaim Defendant Srinivasa Rao Gubbala and Counterclaim Defendant Gannetfisher LLC.

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